MASSACHUSETTS

40 main st, suite 301 florence, ma 01062 tel 413.585.1533 fax 413.585.8904 WASHINGTON

501 third street nw, suite 875 washington, dc 20001 tel 202.265.1490 fax 202.265.1489



Ms. Marlene H. Dortch, Secretary Federal Communications Commission 445 Twelfth Street, SW Washington, DC 20554

June 29, 2011

Re: Notice of Ex Parte Presentation

RE: RM No. 11592; WT Docket Nos. 11-18, 11-65; WC Docket No. 05-25

Dear Ms. Dortch,

This letter is to advise you, in accordance with Section 1.1206(b) of the Commission's rules, that on June 27, 2011, Chris Riley, Matt Wood, and Cary Adickman of Free Press met with Louis Peraertz, Legal Advisor for Commissioner Clyburn.

We discussed the consumer benefits of cellular handset interoperability among wireless carriers, including the ability of consumers to use the same device on other carriers' networks and the possible reduction of prices both for devices and services due to reduced costs for competing carriers. We also indicated that there do not appear to be any insurmountable technical barriers to implementing carrier interoperability, and that any barriers that exist can and ought to be resolved by engineers. Finally, we posited that interoperability across 700 MHz commercial and public safety bands would benefit public safety by creating network redundancy and lowering per-unit device costs for public safety users.

Additionally, we briefly discussed the Commission's open proceeding on special access reform. We reiterated our support of reform and echoed our agreement with others' concerns that the proposed merger of AT&T and T-Mobile would exacerbate the already poor state of competition in the special access market by removing a buyer from the marketplace. Finally, we also discussed the impact of the Commission's action in these areas on its consideration of AT&T's proposed acquisition of Qualcomm's 700 MHz spectrum licenses.

Sincerely,

/s/ *Chris Riley* 

Chris Riley, Policy Counsel Free Press, Washington Office criley@freepress.net

CC: Louis Peraertz